

**Presentment Date and Time: March 24, 2021, 12:00 noon (EDT)**  
**Objection Deadline: March 24, 2021, 11:30 a.m. (EDT)**

AUDREY STRAUSS  
United States Attorney for the  
Southern District of New York  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11  
:  
MOTORS LIQUIDATION COMPANY, *et al.*, : Case No. 09-50026 (MG)  
f/k/a General Motors Corp., *et al.*, :  
:  
Debtors. : (Jointly Administered)  
:  
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**NOTICE OF PRESENTMENT OF AN ORDER APPROVING THE REAPPOINTMENT  
OF EPLET, LLC TO A THIRD TERM AS ADMINISTRATIVE TRUSTEE OF THE  
ENVIRONMENTAL RESPONSE TRUST**

PLEASE TAKE NOTICE that upon the annexed motion, dated March 17, 2021 (the “Motion”), of the United States of America, by its attorney Audrey Strauss, United States Attorney for the Southern District of New York, pursuant to section 105 of the Bankruptcy Code, the undersigned will present the attached proposed order re-appointing EPLET, LLC, by and through Elliott P. Laws, Esq., as Administrative Trustee of the Revitalizing Auto Communities Environmental Response Trust (“RACER”), which is charged pursuant to an Environmental Response Settlement Trust Settlement Agreement and Consent Decree approved by the Court on July 5, 2009, with carrying out needed environmental actions at certain properties formerly

owned by Debtor Motors Liquidation Company (f/k/a General Motors Corporation, hereinafter, “MLC”), and its affiliated debtors (collectively, the “Debtors”), pursuant to Local Bankruptcy Rule 9074-1(d), to the Honorable Martin Glenn, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on Wednesday, March 24, 2021, at 12:00 noon (Eastern Time), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed order must be made in writing and received in the Bankruptcy Judge’s chambers and by the undersigned not later than 11:30 a.m. on Wednesday, March 24, 2021. The ECF docket number to which the filing relates shall be included in the upper right hand corner of the caption of all objections. Unless objections are received by that time, the order may be signed.

Dated: New York, New York  
March 17, 2021

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney for the  
Southern District of New York  
*Attorney for the United States of America*

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TO: All parties via ECF notification

And by email to  
Matthew Goren, Esq.  
Thomas Mayer, Esq.  
Matthew Williams, Esq.  
Carl Garvey, Esq.  
Counsel for all remaining signatories to the Environmental Response Trust Settlement  
Agreement and Consent Decree

And by fax to the Office of the United States Trustee